

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Peter J. Mauro, being duly sworn, hereby states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation, and, as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to Title 18, U.S.C., Sections 3052 and 3107; and DOJ regulations set forth at Title 28, C.F.R., Sections 0.85 and 60.2(a).

2. I have been employed by the Federal Bureau of Investigation (hereinafter "FBI") as a Special Agent since August of 2009 and have been assigned to the Cleveland Division, since December 2009. I have been assigned to and participated in investigations in the area of general criminal matters, as well as the Joint Terrorism Task Force, which investigates threats of violence, racially or ethnically motivated violent extremism, investigations involving explosives, and investigations involving firearm violations. I have participated in all of the usual methods of investigation including, but not limited to, financial analysis, physical surveillance, cooperating witnesses, confidential human sources, telephone toll record analysis, interception of wire and cellular telephone communications, consensual monitoring, and the execution of search and arrest warrants. Additionally, and relevant to the allegations herein I have also attended advanced evidence response team training which included advanced evidence collection training pertaining to post blast scenes and explosive devices.

3. Prior to my employment with the FBI, from 2003 until 2009 I was a Staff Sergeant in the United States Air Force, during which time I served in the Security Forces. As part of those duties, I served in Iraq and witnessed firsthand the production, placement, detonation, and disposal of Improvised Explosive Devices. I hold an associate degree in criminal justice, a bachelor's degree in psychology, and am currently earning my master's degree in criminal justice.

4. Over the course of my employment as an FBI Special Agent I have conducted and participated in multiple criminal investigations that have resulted in arrests for violent criminal offenses. These crimes resulted in subsequent convictions in Federal Courts.

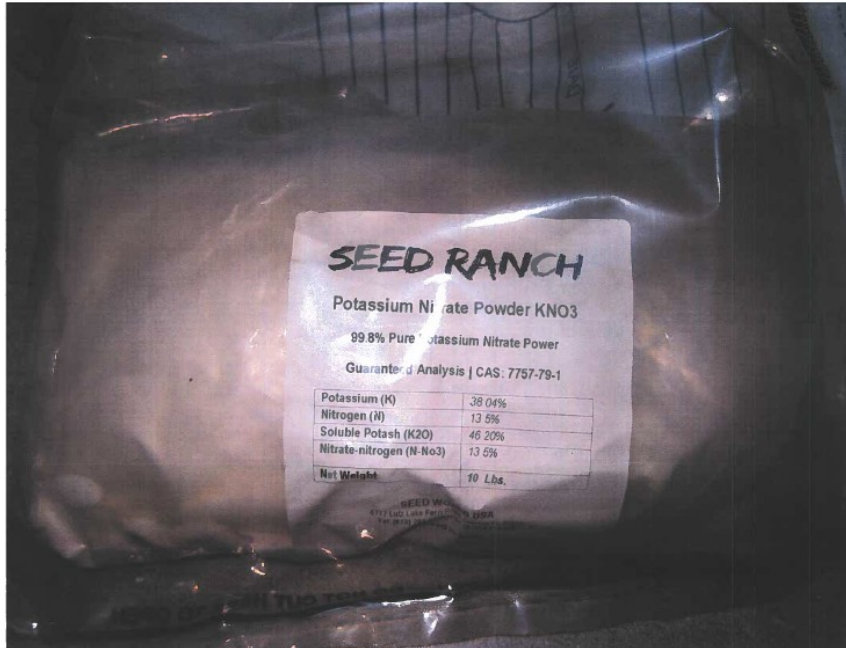
5. This affidavit is being submitted in furtherance of an ongoing criminal investigation. It is based upon my own personal knowledge, my review of law enforcement reports, my discussions with other law enforcement agents and officers, and examination of available evidence. The information contained in this affidavit does not describe the entirety of this investigation but sets forth only those facts necessary to establish probable cause for the requested complaint.

6. Based on the facts set forth in this affidavit, there is probable cause to believe that **Andrew F. Dodson (DODSON)** has committed violations of 26 U.S.C. §§ 5845(f) (Destructive Device), 5861(d) (Receiving or Possessing an Unregistered Destructive Device), and 5871 (Penalties), by receiving or possessing an unregistered destructive device, including a combination of parts designed and intended for conversion into such a destructive device and from which such destructive device may be readily assembled; and a violation of 18 U.S.C. § 1001 (Making False Statements), which prohibits knowingly and willfully making materially false, fictitious or fraudulent statements in any matter within the jurisdiction of the executive branch of the United States.

BACKGROUND AND PROBABLE CAUSE

7. On or about July 23, 2021, the FBI received a phone call from Orange, Ohio Fire Department that stated that the Orange Police Department had arrested a man the previous day for an alcohol related driving offense. During the arrest and impounding of the vehicle, Orange officers discovered a large cache of explosive precursors to include approximately 10 pounds of Potassium Perchlorate, Potassium Nitrate, powdered sugar, batteries, Vaseline (items based on my training and experience are used to make explosive devices), and a black tactical bag with the words, “POLICE” on it, containing ear protection and safety glasses. Following are photographs of the plastic bags labeled “potassium perchlorate” and “potassium nitrate” located in the trunk of Dodson’s vehicle during the July 23, 2021, inventory conducted by the Orange Police Department.





8. On or about July 23, 2021, Affiant contacted a detective at the Orange Police Department who relayed that Andrew F. Dodson, date of birth XX/XX/1989, social security number XXX-XX-8429, driver's license address in Mogadore, Ohio (PREMISES) was the individual described in paragraph seven, and that DODSON was currently being held at the Beachwood City Jail in Beachwood, Ohio.

9. On or about July 23, 2021, Agents interviewed DODSON at the Beachwood City Jail. Affiant recorded the interview. DODSON confirmed that there was Vaseline, potassium nitrate, potassium perchlorate, powdered sugar in his vehicle at the time of his arrest. DODSON stated that he used these materials to make smoke bombs for the 4th of July. DODSON stated the Vaseline and paraffin wax are mixed together, melted, and applied with a Sharpie marker to make an end-cap for a smoke bomb. DODSON stated that he made a bunch of smoke bombs for the 4th of July and deployed them at his brother's house who lives in Tallmadge, Ohio. DODSON described lighting the smoke bombs in the presence of children and allowing children to run around them and play with

them. DODSON stated that when he had deployed all of the smoke bombs that he had made for the 4th of July, he took the remaining powders, placed them on the ground, and lit it on fire for the kids, and that they really enjoyed it. DODSON stated that he still had the materials in his vehicle at the time of his arrest because he had not yet had time to return them to his parents' residence where he stores them. DODSON specifically denied ever manufacturing a destructive or explosive device.

10. On or about July 23, 2021 Affiant spoke with an FBI Special Agent Bomb Technician who stated that while the chemicals found by the police could be used to make smoke bomb-like devices, the chemicals found are also used to make cap-sensitive improvised explosives like those colloquially known in the bomb community as "Poor-Man's C4."¹ The FBI Special Agent Bomb Technician stated that Vaseline would not normally be a component of an improvised smoke bomb but is more commonly a component of "Poor-Man's C4". Furthermore, on or about July 26, 2021, Affiant served a subpoena on CHEMICAL COMPANY regarding DODSON. On or about July 26, 2021, the CHEMICAL COMPANY responded that DODSON had purchased a total of 50 pounds of Potassium Perchlorate between April 2020 and June 2020. Specifically, on or about April 15, 2020, DODSON purchased 10 pounds of Potassium Perchlorate which was ordered and sent to his residence located at the PREMISES. On or about June 14, 2020, DODSON purchased 20 more pounds of Potassium Perchlorate which was also ordered and delivered to the PREMISES. An additional 30 pounds was shipped to DODSON at another address. The FBI Special Agent bomb technician stated that this chemical, Potassium Perchlorate, is primarily used for making explosives. The bomb technician did not know this large amount of the chemical to be regularly used in creating

¹ Cap-sensitive is a term to indicate the sensitivity of a given explosive. Cap-sensitive means that the material will detonate when a blasting cap [improvised or manufactured] is introduced.

homemade smoke devices, however, technically could be used for that purpose. The FBI Special Agent bomb technician and a laboratory chemist both concurred that the chemicals and precursors found in the vehicle at the time of DODSON's arrest could be used to construct a destructive device without any additional materials.

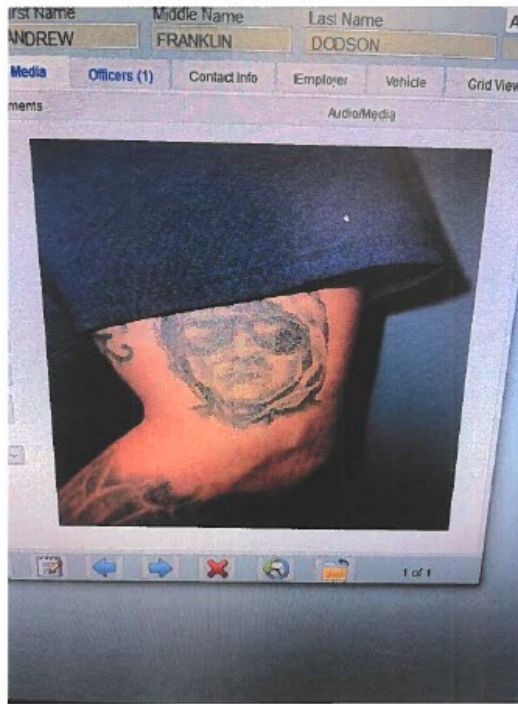
11. The CHEMICAL COMPANY subpoena also showed that DODSON purchased the chemicals using two separate email addresses which included "88" in their addresses².

12. DODSON stated that he has videos on his FACEBOOK profile where he has homemade smoke bombs in big cardboard tubes that he deployed on his driveway to display them. DODSON stated that he would make many of them, mixing ingredients with paraffin wax, which would make a thick, heavy smoke. DODSON stated that he learned how to make the devices using knowledge that he learned from the internet, and that he used to tinker with leftover fireworks after the 4th of July as a child.

13. DODSON was questioned by the interviewing Agents regarding the presence of a tattoo of Ted Kaczynski on his left forearm.³ DODSON stated that there was no ideology behind the tattoo, and that he considered getting a tattoo of Jesus masturbating with the hole in his hand in its place instead.

² Racially or ethnically motivated violent extremists driven by a belief in the superiority of the white race (RMVEs) commonly use the number '88' contained within their online monikers to pay homage to Adolf Hitler. '88' represents the phrase "Heil Hitler" because 'H' is the eighth letter of the alphabet. Since DODSON used '88' on both his Gmail email as well as Yahoo email address, and no other logical reason for these numbers were discovered in the investigation, it is possible DODSON is paying homage to Hitler. The FBI is charged with investigating RMVEs which includes those who are motivated to violence based on their belief in the superiority of the white race,. Nationally, and historically, these RMVEs have been known to share bomb making materials online and construct explosive devices in furtherance of their ideological agenda. The use of explosives and improvised explosive devices are commonly used by these RMVEs.

³ Ted Kaczynski, also known as the "Unabomber", was convicted in 1998 of making explosive devices and mailing or hand-delivering them to his intended victims.



14. DODSON was identified on Facebook through an associate listed on DODSON's Accurint.com report. Upon looking through liked photos on the associated Facebook, Affiant discovered that Dodson's profile was his name spelled backwards, 'Werdna Nosdod'. In addition, the URL is facebook.com/andrew.f.dodson, which is DODSON's first, middle initial, and last name. Affiant observed the profile photograph as an adult male matching DODSON wearing a gas mask, next to a small girl also wearing a gas mask. Affiant believes based on the facts herein that the girl is likely DODSON's daughter.

15. On or about July 26, 2021 Affiant spoke with DODSON's brother. DODSON's brother stated that on the 4th of July 2021 he witnessed his brother, DODSON, light smoke bombs and a pile of chemicals at the end of his driveway. DODSON's brother stated that the intended audience of the display was for the family children's observation. DODSON's brother was questioned about DODSON's tattoos and he stated that he thought his brother was "an idiot", and that he had a large

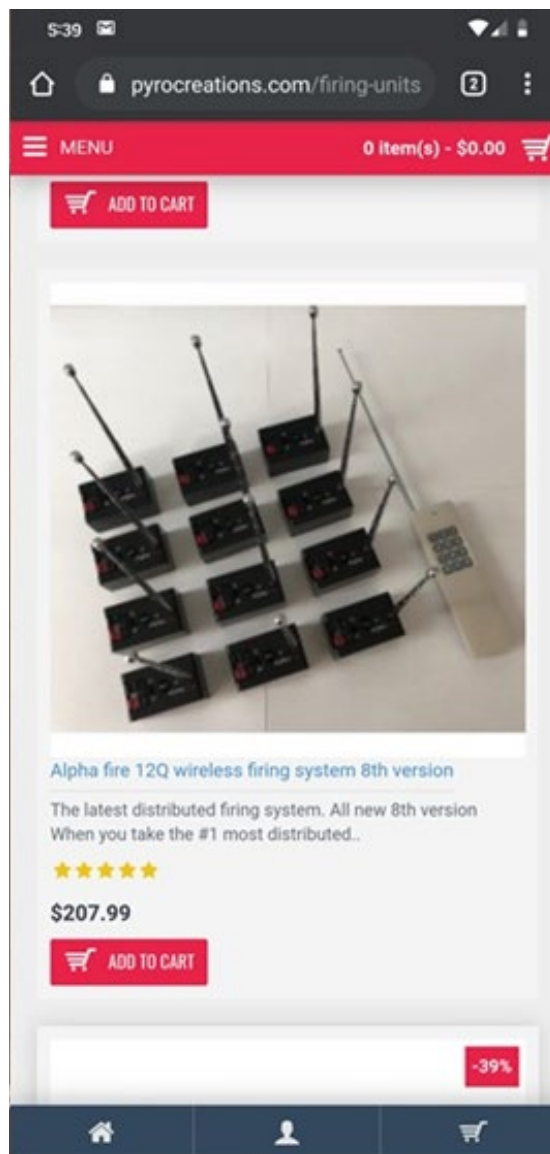
demon on his chest, and a tattoo of John Wayne Gacy on his arm. DODSON's brother believed that he did these things for attention.

16. On or about July 26, 2021, Affiant spoke with DODSON's mother at the Mogadore residence. The interview took place in the kitchen. DODSON's mother told me that she also observed DODSON make and deploy the smoke bombs for the 4th of July 2021 and that he did so with his daughter. DODSON's mother also described some of DODSON's tattoos to include a swastika⁴ on his arm, that she demanded he cover prior to a previous court appearance following a previous arrest. DODSON's mother denied having knowledge of DODSON storing the chemicals at her residence but indicated that DODSON resides with her on a couch that he owns upstairs.

17. On or about July 29, 2021, in response to a Federal search warrant, Facebook provided Affiant records related to DODSON's account "Werdna Nosdod." The records reveal that on or about July 10, 2020 DODSON was peer-to-peer messaging with USER1. USER1 and DODSON discussed meeting up. USER1 discussed defending her house like the character Rambo. DODSON stated, "If you're Rambo, who am I though lol. People call me the Unabomber." DODSON then sent a photograph of his tattoo depicting the UNABOMBER. DODSON then discussed placings explosives at USER1's house, stating "I'll set up parimeter [sic] alarms, and have explosive [sic] on remote detonators. They're at .#1 BOOM they're at #9 BOOM hahs [sic]." DODSON then sent a picture of 157 fused devices that appeared to be similar in likeness and kind to improvised to explosive devices to USER1, followed by a photograph of a remote detonator and 12 radio antenna devices.

⁴ DODSON previously having a swastika tattoo is also consistent with RMVE activities and sympathizers.





The 12 radio antenna devices were described in the photograph as, “Alpha Fire 12Q wireless firing system 8th version.” DODSON then informed USER1 that he has improvised claymores that contain approximately 1,000 BBs per device.⁵ Your affiant believes BBs are commonly used as shrapnel in these types of improvised devices. DODSON then tried to sell USER1 soft body-armor emblazoned

⁵ Claymores are directional anti-personnel mine which can be activated remotely or by tripwire. Claymores fire a pattern of metal balls into a designated area, similar to a shotgun, with the intention of causing death or serious bodily injury. The use of BBs in a destructive device would mimic the destructive capability of a claymore.

with the “Punisher” emblem and a flame thrower. DODSON then sent USER1 a photograph of an individual who your affiant recognizes as his daughter holding the flamethrower. In the background is the “Punisher” soft armor, firearms, and what appear to be improvised grenades for a grenade launcher (40 mm style). Affiant also located a photograph from the Facebook records displaying a closer depiction of a bandolier containing the improvised grenades and a grenade launcher.

Improvised grenades are destructive devices which cannot be manufactured without a license and must be registered.



18. On or about July 20, 2020 DODSON in peer-to-peer messaging with FACEBOOK USER2 discussed a private gun sale. On or about July 25, 2020, the conversation changed to improvised explosive devices. USER2 asked DODSON: “What do these do?” (sending a photograph of cardboard tube pieces about the size of an adult thumb). DODSON replied and called them “comets” with instructions to glue them with hot glue. USER2 then asked if he should insert the

pictured piece into the shell with powder and primer, and DODSON confirmed. USER2 sent another picture and confirmed instructions of what to do with the components. DODSON then corrected USER2 and specified that he should glue the piece in question, into the hull. USER2 thanked DODSON. DODSON replied, “what’s the worst that could happen lol” to which USER2 stated, “Id much rather not find out loo.” DODSON then stated that, “I’ve had some mishaps when I first started shooting one.. I still have a slight ring in my left ear lol.” USER2 then stated, “They blow up in the tube” to which DODSON stated, “Right as it came out I put wayyy too much powder in it.” USER2 stated, “I only fill that little cap”, to which DODSON responded, “Took a lot of trial and error to figure out the right amount. Sometimes it would just blow them apart and they wouldn’t go off at all.” The pictures coupled with the written description of how to assemble the devices lead your affiant to believe DODSON is instructing USER2 in how to manufacture destructive devices. The FBI Special Agent bomb technician confirmed that this conversation is consistent with manufacturing destructive devices.

19. ATF has conducted a search of the National Firearms Registration and Transfer Record and found no evidence of any registration of firearms or destructive devices by DODSON.

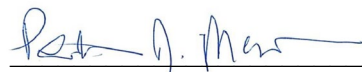
20. Your Affiant believes that DODSON has created destructive devices in violation of 26 violations of 26 U.S.C. §§ 5861(d) (Receiving or Possessing an Unregistered Destructive Device), 5845(f), and 5871, by receiving or possessing an unregistered destructive device, including a combination of parts designed and intended for conversion into such a destructive device and from which such destructive device may be readily assembled. The variety of precursors, amount of supplies, and protective equipment for loud noises found in his vehicle is contradictory to statements made by DODSON that they were only intended to make smoke-bombs and FBI technicians have

stated that the components by themselves can be assembled to make a destructive device. Evidence obtained from Facebook reveals that DODSON has participated in conversations and shared photographs concerning the making and deploying of destructive devices, including claymores and grenades. Further, Affiant believes that DODSON violated 18 U.S.C. § 1001, by making a materially false, fictitious, or fraudulent statements during an investigation within the jurisdiction of the executive branch of the United States when he denied ever manufacturing a destructive or explosive device.

CONCLUSION

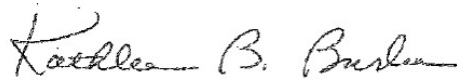
21. Based on the above information, and my experience and training, I believe there is sufficient probable cause to believe that on or about July 22-23, 2021, in the Northern District of Ohio, Eastern Division, Andrew F. DODSON committed violations of 26 U.S.C. §§ 5845(f) (Destructive Device), 5861(d) (Receiving or Possessing an Unregistered Destructive Device), and 5871 (Penalties); and 18 U.S.C. § 1001 (Making False Statements). Your Affiant requests that an Arrest Warrant be issued for Andrew F. DODSON.

FURTHER AFFIANT SAYETH NOT



Peter J. Mauro, Special Agent
Federal Bureau of Investigation
Cleveland, Ohio

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Fed. R. Crim. P. 3, 4(d), and 4.1, this 2nd day of August 2021.



Kathleen B. Burke, U.S. Magistrate Judge